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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUN 13 2025 JXM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CHARLES A. MURRAY,

Plaintiff,

v. ARLINGTON HEIGHTS PARK DISTRICT,

Defendant.

1:25-cv-06596

Judge Franklin U. Valderrama

Magistrate Judge Keri L. Holleb Hotaling

RANDOM/CAT. 2

Case No.: _____

JURY TRIAL DEMANDED

COMPLAINT FOR DISCRIMINATION

Plaintiff, Charles A. Murray ("Plaintiff"), by and through his undersigned attorney, complains against Defendant, Arlington Heights Park District ("Defendant"), as follows:

I. INTRODUCTION

Plaintiff brings this action against Arlington Heights Park District for unlawful discrimination in violation of **Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.**, the **Age Discrimination in Employment Act (ADEA), 29 U.S.C. § 621 et seq.**, and/or other applicable federal and state laws.

II. JURISDICTION AND VENUE

This Court has jurisdiction under **28 U.S.C. § 1331** (federal question) and **28 U.S.C. § 1333** (civil rights).

Venue is proper in this District under **28 U.S.C. § 1331(b)** because the alleged unlawful conduct occurred within the Northern District of Illinois.

III. PARTIES

Plaintiff, Charles A. Murray, is a resident of Cook County, Illinois.

Defendant, Arlington Heights Park District, is a municipal entity located in Cook County, doing business in Illinois it's principal place of business at 410 N. Arlington Heights Road, Arlington Heights, Illinois 60004.

IV. FACTUAL ALLEGATIONS

Plaintiff was employed by Defendant as a Tennis Professional from November 2021 to Currently working at Arlington Heights Park District

Plaintiff is a member of a protected class under federal law based on [race/color/religion/sex/national origin/age (40+)/disability/other].

During the Plaintiff's employment, Defendant engaged in discriminatory conduct, including but not limited to:

1. Plaintiff Charles Murray applied for a promotion at the Heritage Tennis Club owned and operated by the Arlington Heights Park District. The plaintiff's application was submitted and ignored, no interview or conversation. Despite having been told he would have a interview and would be considered. The Plaintiff was a current employee of the Arlington Height Park District with more than 30 years experience.
2. The Plaintiff was hired as a Tennis Professional for \$26.00 per hour.,
The defendant hired two white employees after the Plaintiff, for \$30+ per hour.
3. Retaliation following the plaintiff filing a EEOC Complaint he suffered retaliation. A write up for violating a new policy that was
4. The policy was Implemented during a 8 week period that the Plaintiff was off work with a concussion injury suffered on the job.
5. . The defendant denied all workman's compensation benefits and stating the Plaintiff was not injured on the job.

6. Russ Hadziabic made a statement to the plaintiff Charles Murray he stated “Jeff Love is your age he Is not seeking a management position. “He is happy just teaching”

6. Russ Hadziabic also stated only staff that are fulltime will be considered for promotion. That requirement was never part of The Job Posted on the United Stated Professional Tennis Association.

The manager Chris Nisbet sent me a message “Thank you for sharing your interest in the full-time teaching position at HTC. I will review your resume and get back to you on the timeline for interviews and hiring for the position.

[Provide examples of how similarly situated employees outside Plaintiff’s protected class were treated more favorably]

A. New Tennis Professionals that were hired after the Plaintiff, less experienced staff were paid a higher rate \$30+ per hour.

B. In a second attempt to be considered for a different promotion. Russ Hadziabdic Head Tennis Professional scheduled a meeting with the plaintiff Charles Murray To discuss appointing the Lead Pro position. The meeting was set to a 10am to be held at the Forest View Tennis Club in Arlington Heights

When the Plaintiff arrived there was no one was there. The meeting had secretly moved to the Heritage Tennis Club and Plaintiff was not notified.

The exception was a younger white employees we notified and attended meeting, during that meeting a younger white employee was appointed to the position.

When the plaintiff asked “What is the criteria for you decision, Russ Hadziabic replied “Only fulltime employee could be considered for the position.” “ You are not fulltime!”

Plaintiff exhausted administrative remedies by filing a timely charge with the Equal Employment Opportunity Commission (EEOC) and received a Right to Sue letter (attached)

V. CLAIMS FOR RELIEF

COUNT I – DISCRIMINATION IN VIOLATION OF TITLE VII (42 U.S.C. § 2000e)

10. Plaintiff re-alleges and incorporates the preceding paragraphs.
11. Defendant discriminated against Plaintiff based on [protected characteristic], resulting in [adverse employment action].
12. Defendant's conduct was **willful and intentional**, entitling Plaintiff to compensatory and punitive damages.

COUNT II – AGE DISCRIMINATION IN VIOLATION OF THE ADEA (29 U.S.C. § 621)

13. Plaintiff alleges and incorporates the preceding paragraphs.
14. Plaintiff, being **40 years of age or older**, was subjected to discriminatory treatment based on age.
15. Defendant's actions were **willful**, entitling Plaintiff to liquidated damages.

[ADD ADDITIONAL COUNTS IF APPLICABLE (e.g., retaliation, hostile work environment, state law claims)]

VI. JURY DEMAND

Plaintiff demands a trial by jury on all issues.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Enter judgment in Plaintiff's favor against Defendant;
- B. Award **compensatory damages** for emotional distress, lost wages, and benefits;
- C. Award **punitive/liquidated damages**;
- D. Grant **injunctive relief** (e.g., reinstatement, policy changes);
- E. Award **attorneys' fees and costs**; and
- F. Grant any further relief the Court deems just.

Dated: 6/12/2025

Respectfully submitted,

Charles A. Murray

774 Barnaby place

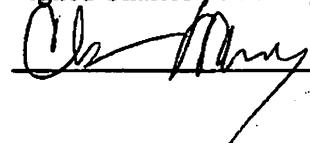
Wheeling, Illinois

cmurr4@hotmail.com]

Attorney for Plaintiff

ProSe

Signed Charles A. Murray



6/12/2025

ILLINOIS DEPARTMENT OF
Human Rights

JB Pritzker, Governor
James L. Bennett, Director

July 12, 2024

CHARLES MURRAY
774 BARNABY PLACE
WHEELING, IL 60090

Re: CHARLES MURRAY vs ARLINGTON HEIGHTS - PARK DISTRICT # 250712.011

Dear Complainant

You are receiving this letter because you filed a charge with the United States Equal Employment Opportunity Commission (EEOC). The EEOC and the Illinois Department of Human Rights (Department) are parties to a cooperative agreement. Under this agreement, when you filed your charge of discrimination with the EEOC, a copy of the charge was automatically filed with the Department. The Department is keeping a copy of your EEOC charge on file to preserve jurisdiction under Illinois law.

Since you filed your discrimination charge initially with the EEOC, the EEOC is the governmental agency responsible for investigating the charge and the investigation will be conducted pursuant to the rules and procedures adopted by the EEOC. The Department will take no action on your charge until the EEOC issues its findings. After the EEOC issues its findings, if you want the Department to take any further action on your charge, you must send the Department a copy of the EEOC's findings within 30 days after service of the EEOC's findings on you. Please also send a one sentence written statement requesting that the Department investigate your charge and include the above Control Number. You may submit a copy of the EEOC's findings by either of the following methods:

By Mail: Send your EEOC findings and written statement via U.S. Postal certified mail, return receipt requested, to: Illinois Department of Human Rights, Attn: EEOC Referred Charges/Intake Unit, 555 W. Monroe Street, 7th Floor, Chicago, IL 60661.

Or By Email: Send your EEOC findings and written statement via email to:
IDHR.preinvestigation@illinois.gov

If you received the EEOC's findings prior to receipt of this letter, you have 30 days from the date of this letter to send the Department a copy of the EEOC's findings. Upon receipt of the EEOC's findings, the Department will mail you a notice as to what further action the Department may take on your charge.

The 365-day time period for the Department to investigate your EEOC charge is tolled while the EEOC is investigating your charge and does not begin to run until the EEOC issues its findings. Your failure to timely provide the EEOC's findings to the Department will result only in the Department closing your file. This process does not affect the investigation of your charge at EEOC. If you do not wish to proceed with the Department, you do not need to take any further action.

This letter does not apply to any settlement of this charge the parties have made with the EEOC.

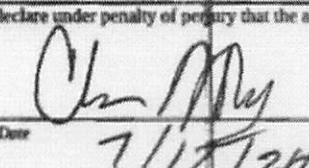
If you have any questions, please contact the Counselor of the Day at (312) 814-4320.
Please do not contact the EEOC.

ILLINOIS DEPARTMENT OF HUMAN RIGHTS.

555 West Monroe, Floor 7, Chicago, IL 60661, (312) 814-6200, TTY (866) 740-3953, Housing Line (800) 662-3942
524 South 2nd Street, Springfield, IL 62701, (217) 785-5100
2309 West Main Street, Marion, IL 62959 (618) 993-7463
dhr.illinois.gov

CC: **ARLINGTON HEIGHTS - PARK DISTRICT
660 NORTH RIDGE AVENUE
ARLINGTON HEIGHTS, IL 60004**

EEOC Form 5 (11-09)

CHARGE OF DISCRIMINATION		Charge Presented To:	Agency(ies) Charge No(s):
<p>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>		EEOC FEPA	440-2024-10022
Illinois Department Of Human Rights <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs., Miss, Mr., Dr., Hon., Rev.) Charles Murray		Home Phone (847) 770-8679	Year of Birth 1958
Street Address 774 Barnaby Place Wheeling, IL 60090			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Arlington Heights - Park District		No. Employees, Members 15 - 100 Employees	Phone No. (847) 577-3020
Street Address 660 North Ridge Avenue Arlington Heights, IL 60094			
Name		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON Age, Color, Retaliation		DATE(S) DISCRIMINATION TOOK PLACE Earliest 09/30/2023	
		Latest 09/30/2023	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I began my employment with Respondent on or about November 11, 2021. My current position title is Tennis Instructor. During my employment, I applied for the promotional position of Lead Tennis Professional. I was not selected for the position. Instead, Respondent selected my younger, and lesser-qualified colleague. I inquired about not being selected for the position. Subsequently, my hours were significantly reduced.			
I believe I have been discriminated against because of my age, 65 (YOB: 1958), and in retaliation for engaging in protected activity, in violation of the Age Discrimination in Employment Act of 1967, as amended.		NOTARY – When necessary for State and Local Agency Requirements	
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
I declare under penalty of perjury that the above is true and correct.  Date 7/12/24		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
Charging Party Signature			